

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Tonawanda Coke Corporation - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region II

Subject: POLREP #28
RV1
Tonawanda Coke Corporation
0201601
Tonawanda, NY

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From: Peter Lisichenko, OSC

Date: 12/27/2018

Reporting Period: 12/22/18 through 12/27/18

1. Introduction

1.1 Background

Site Number:	A28U	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	CERCLA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	10/17/2018	Start Date:	10/17/2018
Demob Date:		Completion Date:	
CERCLIS ID:	NYD088413877	RCRIS ID:	
ERNS No.:		State Notification:	Yes
FPN#:		Reimbursable Account #:	

1 Incident Category

Abandoned coke manufacturing plant releasing hazardous substances into the environment.

1.1.2 Site Description

Tonawanda Coke Corporation is a coke manufacturing plant; approximately 160 acres in an industrial area. The facility has been in operation for approximately 100 years. The 30 currently operating coke ovens have been in use since early 1960.

1.1.2.1 Location

The facility is located at 3875 River Rd, Tonawanda, Erie County, New York. The area is an industrial area adjacent to the Niagara River. The nearest residence is located approximately 0.25 miles away.

1.1.2.2 Description of Threat

Flammable liquids contained in bulk storage tanks pose a threat of fire and explosion should they encounter an ignition source. Sodium hydroxide, a corrosive material, has been discharged onto the ground and poses a health threat to anyone who may come in contact with this material. One scrubber tower contains a

pyrophoric material which may spontaneously combust if the nitrogen blanket inside the vessel is not maintained. Drums of hydrochloric acid and solvents are being stored on an unpaved surface without secondary containment. A full removal site evaluation will be conducted and addressed following facility shutdown.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA is evaluating the Site, to identify all areas of concern and determine which facility operations will require EPA's immediate attention to circumvent a release of hazardous substances to the environment.

2. Current Activities

2.1 Operations Section

2.1.2 Response Actions to Date

See previous POLREPS for additional response actions.

The shutdown of the boiler and ammonia still was conducted on December 26, 2018 after the contents of the Weak Ammonia Liquor tank (PT02) had been drained to its withdraw port and no other liquids could be extracted. As part of the shutdown process, all tanks and lines associated with the boiler house operations (including the water pre-treatment system) will be drained and emptied.

The process to de-energize and take off-line utilities in unused portions of the facility continued with the closure of boiler plant. With the exception of the locker rooms, site office, and guard shack, domestic water service has been turned off for all structures on the site. Pumping operations from the Niagara River have also been terminated ending the constant feed to the 70-foot standpipe tank located at the Site. As a result, all fire hydrants on-site are no longer operable; the first responder has been notified on this operational change and an updated contingency plan is forthcoming. The standpipe is currently being drained. Industrial gas service for the boiler plant is scheduled to be terminated at the meter by the utility company on December 28, 2018. Electrical service is to remain active for the portions of the plant that will continue to be utilized including the maintenance shop, warehouse, locker room, office, and guard house.

A Weir Tank (with baffles for oil, water, and particulate separation) was recently delivered to the site and staged adjacent to the "moat". With the ammonia still no longer active, the tank will be used to store water that is collected from secondary impoundments. Once a sufficient volume is generated, a water sample will be collected to determine if additional treatment is necessary prior to discharge to the sanitary sewer system.

The removal of the coal and coke at the Site by Powers Coal & Coke had been delayed this week due to scheduling conflicts with their transportation contractor. Shipping of material is to resume after January 1, 2018.

The implementation of interim actions at Site 108 is currently on hold pending the finalization of the access agreement between the PRP and Tonawanda Coke. Once the access agreement is finalized, tasks by the PRP and their contractors will include: stabilize and repair the secondary containment berms of the ASTs on-site; monitor levels and remove of water within the secondary containments throughout the winter; characterize products within the tanks; prepare plans for product removal and the demolition of the tanks; monitor discharges from cut pipes; and re-tarp and install silt fencing down gradient of existing waste piles.

2.1.3 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

TCC filed for bankruptcy on October 16, 2018. ORC continues to represent EPA's interest with TCC attorneys.

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal

2.2 Planning Section

2.2.1 Anticipated Activities

1. Continue to pump the contaminated water from the containment and sump areas for treatment in the Weir Tank.
2. Conduct a cleanup of the contaminated soil around six different sump areas to mitigate the cross contamination of surface water.
3. Move all containers and vessels containing hazardous substances, pollutants or contaminants, which are currently improperly stored, to a containment area.
4. Continue to maintain and monitor both the plant process water and the surface storm water systems
5. Sample, analyze, remove and ship the hazardous substances, pollutants or contaminants in plant process vessels for disposal.
6. Clean and subsequently remove the plant process containment areas.
7. Winterize the vessels and pipes on the Site to protect from freezing.
8. Evaluate methodology for sealing the sumps at the site.
9. Evaluate the removal of oven gas and by-products piping infrastructure.
10. Evaluate the removal of storage tanks and cylinders.

2.2.1.2 Next Steps

EPA will continue to assess the potential public and environmental threats posed by the Site.

2.2.2 Issues

Electrical and mechanical breakdowns continue to occur due to the antiquated, poor condition of the plant equipment.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

EPA is funding the removal action. The costs below include pending costs.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$1,050,000.00	\$967,603.85	\$82,396.15	7.85%
TAT/START	\$50,000.00	\$2,530.00	\$47,470.00	94.94%
Intramural Costs				
Total Site Costs	\$1,100,000.00	\$970,133.85	\$129,866.15	11.81%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.2 Cooperating Agencies

EPA is coordinating with, DOJ, NYSDEC and the Town of Tonawanda Water Resources Department.

4. Personnel On Site

One OSC, 15 ERRS personnel and 2 RST3 personnel.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

7. Situational Reference Materials

No information available at this time.